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Attorneys for Plaintiff
UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ALEXANDER JAMES TRABULSE,

Defendant.

Case No. 3:09-cr-00350-WHA

STIPULATION AND
[PROPOSED] ORDER

WHEREAS, the Court conducted a hearing on July 10, 2009;

WHEREAS, the government produced approximately 11,351 additional documents to counsel for the defendant and defendant's counsel believes that additional time is necessary to review the evidence and investigate the case, and believes it is in the best interests of the defendant to do so as soon as possible;

WHEREAS, a failure to grant the continuance would deny defense counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence, and under the circumstances the ends of justice served by a reasonable continuance

1 outweigh the best interest of the public and the defendant in a speedy trial;

2 WHEREAS, the defendant consents to a continuation of this case for the above reasons
3 and consents to the exclusion of time from July 10, 2009 until February 8, 2010;

4 THEREFORE, it is hereby stipulated by and between the parties, through their respective
5 counsel of record, that the period of time from July 10, 2009 until February 8, 2010, shall be
6 excluded in computing the time within which the trial of the offense alleged in the Information
7 must commence under Title 18, United States Code, Section 3161.

8 IT IS SO STIPULATED.

9 DATED: July 14, 2009

JOSEPH P. RUSSONIELLO
United States Attorney

/s/ A. Reeves

Adam A. Reeves
Assistant United States Attorney

15 DATED: July 14, 2009

THE OFFICE OF THE
FEDERAL PUBLIC DEFENDER

/s/ L. Stewart

Loren G. Stewart
Counsel for Defendant
ALEXANDER JAMES TRABULSE

1 The Court finds that the ends of justice served by granting a continuance from July 10,
2 2009 to February 8, 2010 outweigh the best interests of the public and the defendant in a speedy
3 trial and in the prompt disposition of criminal cases. The Court therefore concludes that this
4 exclusion of time from July 10, 2009 through and including February 8, 2010 should be made
5 under Title 18, United States Code, Sections 3161(h)(7)(B)-(D).

6 IT IS SO ORDERED.

7
8 Dated: July 14, 2009

